

U.S. DEPARTMENT OF EDUCATION OFFICE OF SPECIAL EDUCATION PROGRAMS

Individuals with Disabilities Education Act (IDEA)
PART B SPECIAL CONDITIONS
PROGRESS REPORT # 2

REPORTING PERIOD: JULY 1, 2014 - SEPTEMBER 30, 2014

SUBMITTED: NOVEMBER 3, 2014

I. Reporting Requirements

The Office of the State Superintendent of Education (OSSE) is pleased to submit this first progress report as required by the Office of Special Education Programs (OSEP) pursuant to the special conditions imposed by the USDE on OSSE's FFY 2014 IDEA Part B grant award.

As outlined in Enclosure E of OSEP's FFY 2014 grant award notice to OSSE, OSSE is required to submit specific data and information related to:

- Demonstrated compliance with the requirement to conduct timely initial evaluations and reevaluations
- Demonstrated effectiveness of OSSE's system of general supervision which identifies and corrects noncompliance in a timely manner
- Demonstrated compliance with secondary transition requirements

OSEP requires that OSSE report on the use of its FFY 2014 IDEA Part B DUF funds to support the reduction in the backlog of overdue initial evaluations and reevaluations and the improvement of secondary transition requirements. These reporting elements continue to be addressed via OSSE's FFY 2014 Corrective Action Plan (CAP) Progress Report, submitted for the same reporting period.

OSSE submits this second progress report to satisfy the above reporting requirements. The District's rate of timeliness for reevaluations continues to be above 90% while the rate of timeliness for initial evaluations has slipped. OSSE is pleased to note significant progress in the domain of secondary transition compliance.

1. Compliance with the Requirement to Conduct Initial Evaluations

<u>Summary of Data for this Reporting Element:</u>

	Initial Evaluations	7/1/2014 –
		9/30/2014
Α	The number of children who, as of the end of the previous reporting	53
	period, had been referred for, but not provided, a timely initial	
	evaluation:	
	1. Previous Report Untimely ¹	21
	2. Late Data Entry Adjustment	32
В	The number of children referred for initial evaluation whose initial	104
	evaluation became overdue during the reporting period	
С	The number of children from (A) and (B) above, who were provided	63
	initial evaluations during the reporting period	
D	The number of children who had not been provided a timely initial	94
	evaluation at the conclusion of the reporting period	
E	The percent of initial evaluations provided to children whose initial	
	evaluation deadlines fell within the reporting period that were	
	conducted in a timely manner. The state must also report actual	
	numbers for the following:	
	1. The number of children whose initial evaluation deadlines fell	802
	within the reporting period	
	2. The number of those children who were provided a timely initial	640
	evaluation	
	3. The number of children, if any, for whom the exceptions in 34 CFR	58
	Section 300.301 (d) applied	
	To calculate the percent of initial evaluations provided in a timely	86%
	manner use the data reported in #2 divided by [1 minus 3] times 100	
F	The average number of days the initial evaluations that had not been	39
	provided in a timely manner were overdue	

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¹ Prior to FFY 2012, OSEP required OSSE to report on timeliness rates related to initial evaluations and placements. Beginning in FFY 2012, OSEP requires OSSE to report on timeliness rates related to initial evaluations. Therefore, the "Previous Report Untimely" rate was calculated utilizing the new metrics required by OSEP.

Discussion of Reported Data:

Timeliness: **86%** of initial evaluations provided to children with disabilities whose initial evaluation deadlines fell within the reporting period were conducted in a timely manner. The calculation used to derive this percentage is 640/(802-58)*100. This rate of timeliness represents slippage compared to the **96%** rate of timeliness reported in the first FFY 2014 progress report submitted to OSEP on July 30, 2014. OSSE believes that this slippage was due to the following factors:

- Part C Transition Report Logic Update: In previous reports, the records for children who were transitioning from Part C to Part B were considered compliant if the child's evaluation was completed by their third birthday. Beginning in this report, a student record will be compliant only if the eligibility is completed within 120 calendar days of the referral. This report logic was updated following clarifying guidance received upon request from OSEP, and the updated logic will be reflected in future reports.
- Negation Event Report Logic Update: Previously, records with events such as parental consent denials and referral discontinuations were counted as timely if the event occurred prior to the due date, since these negative events effectively stop the evaluation process. A logic update has been made to ensure that these records are removed completely from the calculation if such events occurred prior to the due date. The student record will still be considered untimely if the event occurred after the due date had already passed.

Reasons for Delays in Conducting Initial Evaluations in a Timely Manner: The reasons for delay for initial evaluations not held in a timely manner fell into two categories: LEA delay (64%) and parental delay (36%). In instances of parental delay, the LEA made reasonable efforts to complete the evaluation process in accordance with OSSE's Initial Evaluation and Reevaluation Policy dated March 22, 2010 and the exceptions in 34 CFR Section 300.301 (d) applied.

The specific reasons for such delays are further categorized as follows:

Reason for delay	No. of children
Parental delay	
Parental delay for reasons including delays in providing consent, delays in	
responding to LEA requests, and delays in making the child available	58
LEA delay	
Children who withdrew and reentered within the 120 day timeline	9
LEA delay for reasons including delayed action taken related to initial	
referral, and delays in scheduling meetings	95
Total number of children whose initial evaluation became overdue	
during the reporting period	162

OSSE believes that the current backlog can be partly attributed to student mobility related to the beginning of the school year, due to student transition between LEAs and student returns to LEAs from out of state or private settings.

Actions the State is taking to Address Noncompliance: During this reporting period, OSSE continued using data to drive improvement through the continued review of backlog data and the enhancement of the LEA support team model described in previous reports.

During the reporting period, OSSE met with representatives from several LEAs to obtain input on the proposed expansion of OSSE's LEA support team model and incorporate participant feedback. OSSE's model for the 2014-2015 year continues to incorporate ongoing review and root cause analysis of initial evaluation and reevaluation backlog data. This analysis continues to drive targeted technical assistance and systemic improvement.

To help facilitate a reduction in this backlog, OSSE has enhanced the LEA Performance and Planning report to show compliance trends for LEAs. In this report, we have also included a detailed listing of the student records with compliance and/or potential enrollment issues that contribute to their non-compliant status.

OSSE continues to work on streamlining and enhancing its data systems for LEA usage. OSSE has continued to update its online reporting tool, Reports Framework, with new reports that are easy to use and provide quality access to LEA data. These web-based reports are developed based on LEA and central office requests and feedback, through an extensive requirements gathering process. This special education data portal is housed within the OSSE's Statewide Longitudinal Educational Data System (SLED), and allows school and LEA staff to more proactively manage student information, identify overdue events, track deadlines, and rectify data errors.

DSE continues to implement the OSSE Support Tool (OST), a web-based dashboard that serves to allow OSSE with a mechanism to quickly and efficiently respond to LEA inquiries. To date, 4,446 inquiries have been received and addressed in the OST. DSE has also categorized the types of inquiries that may be logged into the tool and identified resolution paths for each type of inquiry. By having a database that will log inquiries and needs from LEAs, OSSE is looking to take a proactive approach in better serving the needs of LEAs. OSSE also continued its practice of sharing, via its monthly webinars for LEA special education points of contact, performance metrics related to its response time in the OST. OSSE believes that this transparency sends a message of shared accountability, builds trust, and demonstrates OSSE's commitment to serving LEAs well.

Last, OSSE and the Public Charter School Board (PCSB) have continued to utilize a data-driven "tiger team" model that meets regularly to review and address challenges that LEAs are experiencing with student records, including record transfers. OSSE is also pleased to report that through a combination on data system improvements and regulatory changes, OSSE is

able to ensure heightened accountability for serving students transitioning from Part C to Part B and students withdrawing from one LEA and enrolling in a new LEA for the upcoming school year.

OSSE believes this combined approach will continue to support improved compliance and reduce the backlog of overdue events for students.

2. Compliance with the Requirement to Conduct Reevaluations

<u>Summary of Data for this Reporting Element:</u>

	Reevaluations	7/1/2014- 9/30/2014
Α	The number of children who, as of the end of the previous reporting period, had been referred for, but not provided, a timely triennial evaluation:	167
	1. Previous Report Untimely	78
	2. Late Data Entry Adjustment	89
В	The number of children whose triennial reevaluation became overdue during the reporting period	39
С	The number of children from (A) and (B) who were provided triennial reevaluations during the reporting period	44
D	The number of children who had not been provided a timely triennial reevaluation at the conclusion of the reporting period	162
E	The percent of triennial reevaluations provided to children whose triennial reevaluation deadlines fell within the reporting period that were conducted in a timely manner. The state must report actual numbers for the following:	
	The number of children whose triennial reevaluation deadlines fell within the reporting period	557
	The number of children who were provided a timely triennial reevaluation	518
	To calculate the percent of triennial reevaluations provided in a timely manner use the data reported in #2 divided by #1 times 100	93
F	The average number of days the triennial evaluations that had not been provided in a timely manner were overdue	29

Discussion of Reported Data:

Timeliness: 93% of reevaluations provided to children with disabilities whose reevaluation deadlines fell within the reporting period were conducted in a timely manner. The calculation used to derive this percentage is (518/557)*100. This rate of timeliness represents progress compared to the 92% rate of timeliness reported in the first FFY 2014 progress report submitted to OSEP on July 20, 2014.

Reasons for Delays in Conducting Reevaluations in a Timely Manner: The reasons for delay for reevaluations not held in a timely manner fell into two categories: LEA delay (85%) and parental delay (15%).

The specific reasons for such delays are further categorized as follows:

Reason for delay	No. of children
Parental delay	
Parental delay for reasons including delays in providing consent, delays in	
responding to LEA requests, and delays in making the child available	6
LEA delay	
Delays in transferring student records from previous LEAs	6
Children who withdrew and reentered more than one year after their	
withdrawal date. These children reentered after the reevaluation due	
date has passed	2
Children who withdrew and reentered less than one year after their	
withdrawal date. These children reentered after the reevaluation due	
date has passed	2
LEA delay for reasons including delayed action taken to start the	
reevaluation process, and delays in scheduling meetings	23
Total number of children whose reevaluation became overdue during	
the reporting period	39

OSSE believes that the reevaluation backlog has increased due to high levels of mobility, both between LEAs and returns to LEAs from out of state or private settings. Specifically, out of 162 students reported in the backlog, at least 82 students withdrew and reentered the school system **more** than one year after their withdrawal date. These students reentered in the current reporting period after their reevaluation due date had passed. Additionally, at least 16 students withdrew and reentered the school system **less** than one year after their withdrawal date. These students reentered in the current reporting period after their reevaluation due date had passed. This trend typically occurs during the beginning of the school year and is considered an LEA delay.

Actions the State is taking to Address Noncompliance: During this reporting period, OSSE continued using data to drive improvement through the continued review of backlog data and the enhancement of the LEA support team model described in previous reports.

During the reporting period, OSSE met with representatives from several LEAs to obtain input on the proposed expansion of OSSE's LEA support team model and incorporate participant feedback. OSSE's model for the 2014-2015 year continues to incorporate ongoing review and root cause analysis of initial evaluation and reevaluation backlog data. This analysis continues to drive targeted technical assistance and systemic improvement.

As noted in the previous section, to help facilitate a reduction in this backlog, OSSE has enhanced the LEA Performance and Planning report to show compliance trends for LEAs. In this report, we have also included a detailed listing of the student records with compliance and/or potential enrollment issues that contribute to their non-compliant status.

OSSE continues to work on streamlining and enhancing its data systems for LEA usage. OSSE has continued to update its online reporting tool, Reports Framework, with new reports that are easy to use and provide quality access to LEA data. These web-based reports are developed based on LEA and central office requests and feedback, through an extensive requirements gathering process. This special education data portal is housed within the OSSE's Statewide Longitudinal Educational Data System (SLED), and allows school and LEA staff to more proactively manage student information, identify overdue events, track deadlines, and rectify data errors.

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Last, OSSE and the Public Charter School Board (PCSB) have continued to utilize a data-driven "tiger team" model that meets regularly to review and address challenges that LEAs are experiencing with student records, including record transfers. OSSE is also pleased to report that through a combination on data system improvements and regulatory changes, OSSE is able to ensure heightened accountability for serving students transitioning from Part C to Part B and students withdrawing from one LEA and enrolling in a new LEA for the upcoming school year.

OSSE believes this combined approach will continue to support improved compliance and reduce the backlog of overdue events for students.

3. General Supervision System

(1) Identification of Noncompliance

This is OSSE's written assurance that all tools used by compliance monitors have been revised and do not make reference to compliance thresholds. In addition, On August 19, 2014, OSSE issued guidance to all District of Columbia LEAs which clarified that OSSE does not use thresholds for identification of noncompliance, and which stated that OSSE will make findings of noncompliance if it determines that an LEA has achieved below 100 percent compliance with a specific requirement.

(2) Correction of Noncompliance

Cor	rection of Noncompliance	04/01/14 - 09/30/14
a.	The number of the remaining 14 findings of noncompliance identified in FFY 2009, the number of the remaining 642 findings of noncompliance identified in FFY 2010, and the number of the remaining 42 findings of noncompliance identified in FFY 2011 that D.C. reported were not corrected under Indicator 15 in the FFY 2012 APR, for which the State verified the noncompliance was corrected more than one year after the State's identification of noncompliance	Subsequent Correction: Total = 345 findings subsequently corrected. FFY 2009 = 6 corrected FFY 2010 = 308 corrected FFY 2011 = 31 corrected
b.	The number of any findings of noncompliance identified in FFY 2009, FFY 2010, FFY 2011 which were reported as corrected before the State verified that the LEA had achieved compliance with the specific regulatory requirements.	FFY 2009 = 4 reopened FFY 2010 = 5 reopened FFY 2011 = 5 reopened
C.	Updated data that reflect the revised total number of remaining findings of noncompliance identified in FFY 2009, FFY 2010, and FFY 2011	FFY 2009 14 reported FFY 12 APR +4 reopened 18 -6 corrected 12 FFY 2009 findings FFY 2010 642 reported FFY 12 APR +5 reopened 647 -308 corrected 339 FFY 2010 findings

		FFY 2011 42 reported FFY 12 APR + 5 reopened 47 -31 corrected 16 FFY 2011 findings remaining
d.	The number of findings of noncompliance DC made during	
	FFY 2012 (July 1, 2012 through June 30, 2013).	645**
e.	The number of findings identified in FFY 2012 for which the	
	State verified that noncompliance was corrected as soon as	475
	possible and in no case later than one year after the State's	
	identification of noncompliance.	
f.	The number of findings identified in FFY 2012 for which the	146
	State verified that noncompliance was corrected more than	
	one year after the State's identification of the noncompliance	
	(i.e. "subsequent correction").	

^{**} This number differs from the number reported in the May 2014 Special Conditions Progress Report because of a data error which attributed 15 findings to FFY 12 which should not have been counted in that year. Corrections have been put in place in the system to prevent such errors in the future.

Discussion of Reported Data:

a. Discussion of Closure of Longstanding Noncompliance

The clarified FFY 2012 APR was submitted on April 30, 2014. OSSE subsequently corrected 345 additional findings from FFY's 2009-2011, including six (6) from FFY 2009, three-hundred and eight (308) from FFY 2010, and thirty-one (31) from FFY 2011.

b. Discussion of Findings Improperly Closed During FFY 2009, 2010, and 2011 In the May 2014 special conditions report, OSSE reported that OSSE discovered that during FFYs 2009-2011, compliance thresholds were used in error with some items on LEA-level monitoring reports. In no case was noncompliance closed prior to correction of all student-level noncompliance, however, on those items where a threshold was applied, no prong II verification occurred.

To ensure all findings are closed in accordance with OSEP Memo 09-02, OSSE reviewed all findings issued in FFYs 2009, 2010, and 2011, and identified 813 findings which had been closed after the State verified correction of the student-level noncompliance, but prior to the State verifying the LEA was correctly implementing the specific regulatory requirements based on a review of updated data.

OSSE reopened the 813 improperly closed findings, and then worked to close each finding in accordance with OSEP Memo 09-02. OSSE closed 180 of the 813 findings by determining which

of the impacted LEAs had been found 100% compliant when subsequently monitored on the same regulatory requirement. Compliance monitors performed prong II verification for the remaining 633 findings, and were able to verify and close an additional 619 findings. To date, 14 findings remain open due to inability to verify that the LEAs are correctly implementing the specific regulatory requirements based on reviews of updated data. The chart below provides the year-by-year breakout of findings and closure status.

FFY	Findings Closed in Error	Sunsequent Additional		Findings Not Yet Verified
FFY 2009	79	9	66	4
FFY 2010	297	7	285	5
FFY 2011	437	164	268	5
Total:	813	180	619	14

c. Update to FFY 2012 APR Data for FFYs 2009, 2010, and 2011

OSSE is updating the data reported in the FFY 2012 APR to include 14 findings for which OSSE was unable to verify correct implementation of the regulatory requirement by the responsible LEAs. This includes four (4) findings from FFY 2009, five (5) findings from FFY 2010, and five (5) findings from FFY 2011. In addition to re-opening the findings as described here, OSSE has closed 345 findings from FFYs 2009, 2010, and 2011. The revised total open findings for each fiscal year are presented in the chart below according to the following formula:

(Reported Findings FFY 2012 APR) + (Reopened Findings)

- Findings Closed Since Submission of FFY 2012 APR

= Updated APR data

	FFY 2009	FFY 2010	FFY 2011
(FFY 2012 APR Data) +	(14) + (4)	(642) + (5)	(42) + (5)
(Re-Opened Following	=18	=647	=47
Threshold Review)			
Minus Subsequently	-6	-308	-31
Closed Findings			
Updated APR Data:	12	339	16
Open Findings			

d-f. Discussion of FFY 2012 Data

OSSE made 645 findings of noncompliance during FFY 2012. In the May 2014 special conditions report, OSSE reported that 660 findings of noncompliance were issued in FFY 2012. Subsequent review of the data revealed that errors in the data reporting system had incorrectly assigned 15 findings to FFY 2012. The technical issues have been corrected, and OSSE has revised the total number of findings of noncompliance for FFY 2012 to 645. OSSE has verified that 475, or 74%, of the 645 findings of noncompliance identified during FFY 2012 were

corrected within the one year timeline. 146 FFY 2012 findings were subsequently closed. Currently, 24 findings from FFY 2012 remain uncorrected.

g. Steps Taken to Ensure Compliance with OSEP Memorandum 09-02
OSSE has taken several steps to ensure that all monitoring is conducted in accordance with OSEP memo 09-02, including ensuring that compliance targets are set at 100%, the LEA corrects all individual- level noncompliance unless the student is no longer within the jurisdiction of the LEA, and that OSSE completes prong II verification of systemic compliance.

The following specific steps have been taken to ensure adherence to requirements:

- 1) OSSE's electronic compliance monitoring system, the District of Columbia Corrective Action Tracking System (DC CATS), automatically requires prong II verification for each area/item of noncompliance identified in a monitoring report.
- 2) The LEA-level monitoring tool has been revised and does not include or make reference to any thresholds.
- 3) In August of 2013, OSSE monitoring staff was given two days of training by national TA providers, focusing on correction of noncompliance, a review of the requirements of OSEP Memo 09-02, and a discussion regarding the prohibition against thresholds.
- 4) OSSE monitoring staff used the knowledge gained in the above training to create a prong II verification flow chart which was distributed to LEAs to clarify requirements and timelines that support timely closure of findings, including the need for OSSE to complete prong II verification.
- 5) OSSE's monitoring and compliance unit has been placed on an accountability plan that holds each monitor responsible for documenting attempts to ensure timely and proper closure of each finding of noncompliance for each LEA on the monitor's caseload. Progress toward closure of findings for each LEA is tracked and updated monthly. Monitors are provided ongoing training on an as-needed basis to ensure that each monitor understands and is able to ensure that noncompliance is closed in accordance with OSEP Memo 09-02.
- 7) OSSE has ensured at each training for LEA staff, the proper closure of noncompliance, including the prong II verification stage, is fully articulated and that timelines for closure of noncompliance and the concept of ascertaining proper systemic implementation of regulatory requirements is fully understood.

h. Actions to Address Remaining Longstanding Noncompliance

To address findings of noncompliance that are not corrected by the LEA within one year of the State's identification of noncompliance, OSSE's Quality Assurance and Monitoring team assesses each LEA's need for training and technical assistance, and arranges for the provision of comprehensive training as necessary. OSSE also provides technical assistance to LEAs

attempting to correct noncompliance identified through dispute resolution activities by providing LEAs with a monthly round-up and discussion of corrective actions associated with State complaints, and by providing technical assistance with the implementation of Hearing Officer Determinations. Finally, OSSE uses the annual LEA Determinations process to levy sanctions as appropriate. OSSE considers information collected for or during APR reporting, other US Department of Education reporting, on-site monitoring, record and database review, audits, dispute resolution processes, and rates of timely correction when making LEA determinations.

4. Compliance with Secondary Transition Requirements

Summary of Data Reported for this Element:

Secondary	4/1/13-	7/1/13-	10/1/13-	4/1/14-	7/1/14-
Transition	6/30/13	9/30/13	3/31/14	6/30/14	9/30/14
Compliance Item					
Total Number of	43	47	46	57	73
Files with All Items					
Compliant					
Percent of Files	43%	47%	46%	57%	73%
with All Items					
Compliant					
Total Number of	9	11	13	12	15
LEAs Reviewed					
Number of LEAs in	1	4	2	2	5
Compliance					

Discussion of Reported Data:

OSSE reviewed a sample of 100 IEPs to determine whether all secondary transition requirements were met. The review was completed on October 8, 2014. OSSE will notify LEAs of the findings by January 8, 2014.

Five (5) of 15 LEAs had files that were fully compliant with all secondary transition requirements.

Seventy-three percent (73%) of IEPs reviewed for the period of July 1, 2014 – September 30, 2014 were compliant with all secondary transition requirements. This represents an increase of 16%, as compared to the prior review period of April 1, 2014 – June 30, 2014, when 57% of IEPs reviewed included all required secondary transition content.

Explanation of Progress

OSSE attributes the increase in compliance rates to multiple factors. First, OSEP provided OSSE a technical assistance session in the area of secondary transition on July 21, 2014, which helped OSSE refine elements of the monitoring process and inspired a change to the SEDS data system which builds in additional compliance prompts in the secondary transition plan. In addition, OSSE piloted a secondary transition focused monitoring project during FFY 2013. OSSE used the DC CATS compliance data tracking system to identify specific DCPS schools that have had persistently high rates of noncompliance with secondary transition items, and worked with LEA-level and school-level staff to review secondary transition compliance requirements, determine specific areas or items that create difficulty at each school, and provide training on all

secondary transition items. The focused monitoring resulted in the development of eightmonth technical assistance plans for the schools most in need of support in meeting secondary transition requirements. The pilot project will end in November of 2014, but the initial results show promise, with the pilot schools consistently achieving more than 75% compliance with secondary transition requirements since the intervention was implemented. By November, OSSE will better understand whether the results of the intervention are sustainable without consistent, direct intervention at the school level by the State.

Actions the State is Taking to Address Noncompliance with Secondary Transition Requirements

To address noncompliance with secondary transition requirements, OSSE has directed one LEA to use 5% of its Section 611 funds to develop support for improved secondary transition plans throughout the LEA. In addition, OSSE provides a variety of training and technical assistance opportunities to LEAs. OSSE continues to provide robust training and technical assistance to LEAs. OSSE's compliance unit has continued to meet with LEAs and PCSB to develop working partnerships on compliance issues and provide technical assistance on meeting compliance requirements including secondary transition requirements. In addition, OSSE continues to work with the State secondary transition Community of Practice (CoP) and has partnered with the George Washington University and the National Secondary Transition Technical Assistance Center (NSTTAC). To support professional development opportunities offered to LEAs during the 2013-14 school year, in June OSSE released 12 recorded webinars around major topic areas in secondary transition. These webinars serve as high quality synopses of the trainings that were provided in-person. In partnership with the CoP, OSSE launched its secondary transition public awareness campaign. The public awareness campaign included highlights of current efforts around secondary transition and a toolkit of fact sheets and resources that serve as a guide to students, parents, and educators of what they need to know to get started in planning for the future. With guidance from NSTTAC, OSSE and the CoP have worked together to develop a State secondary transition plan based on data provided by OSSE's QAM unit. The State plan focuses on the following subgroups that were identified at the 2014 NSTTAC Capacity Building Institute: (a) career development, (b) parent and community involvement, (c) interagency collaboration, and (d) youth leadership. At the September CoP meeting, members divided themselves into these subgroups with the goal of developing resource documents and suggestions for programming. As part of the career development foci, the team decided that it is important to dedicate time on assessments. One of the first resources that will be developed by this subgroup will be the Secondary Transition Assessment Toolkit.

Certification

This report reflects OSSE's good faith efforts to report accurate and reliable data and ensure a full and comprehensive submission. The District of Columbia's Assistant Superintendent of Elementary, Secondary, and Specialized Education, Dr. Amy Maisterra, hereby certifies that this report is complete and appropriate for submission to the Office of Special Education Programs.